

UNITED STATES DISTRICT COURT
for the

Eastern District of Michigan

United States of America

v.

Ahmad Haidar-Ahmad

Case No.

Case: 2:21-mj-30495
Assigned To : Unassigned
Assign. Date : 10/21/2021
Description: U.S. C.
HAIDAR-AHMAD (CMP)(MEV)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 2020 - October 21, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|--|--|
| 18 USC § 2251 | Production of child pornography |
| 18 USC §§ 2252A(a)(2) and 2252A(a)(5)(B) | Distribution and possession of child pornography |

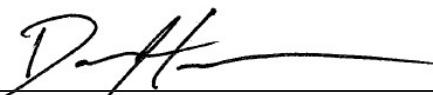
This criminal complaint is based on these facts:
see attached affidavit.

Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

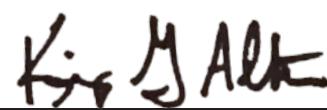
Date: October 21, 2021

City and state: Detroit, Michigan



Complainant's signature

Derek Holden, Special Agent (FBI)
Printed name and title



Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION
FOR A COMPLAINT AND ARREST WARRANT**

I, Derek Holden, being first duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent of the FBI since 2015 and am currently assigned to the FBI Detroit Division. While employed by the FBI, I have investigated numerous federal criminal violations related to child exploitation and child pornography. I have received training in investigating internet fraud, computer intrusions, and matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations. I have experience in the investigation, apprehension, and prosecution of individuals involved in criminal offenses, the use of computers, cellular telephones, and other electronic devices to commit those offenses.

2. This affidavit is based on my personal knowledge, experience and training, information provided by other law enforcement officers, as well as information I've obtained through other investigative means (search, subpoenas, surveillance, etc.). This affidavit does not set forth every fact resulting from this investigation; rather, it contains a summary of the investigation to date for the limited purpose of establishing probable cause to obtain a search warrant.

3. This affidavit is made in support of an application for an arrest warrant charging Ahmad Haidar-Ahmad (DOB: xx/xx/1998) with violations of Title 18, United States Code, Sections 2251 (production of child pornography), 2252A(a)(2) (distribution of child pornography), and 2252A(a)(5)(B) (possession of child pornography).

PROBABLE CAUSE

4. Ahmad Haidar-Ahmad (“Haidar”) has been identified through this investigation to be involved in the production, distribution, and possession of child pornography. As explained below, Haidar had sex multiple times with a minor victim, filmed their sexual encounters, and sent at least one of these videos to the minor victim and a second individual over social media.

5. On October 7, 2021, a 14-year-old minor victim (“MV1”) reported to their school counselor that they were raped by Haidar and that they were currently being sextorted with a video of MV1 having sex with Haidar. On the same day, the school resource officer shared these allegations with the FBI.

6. Based on these allegations, law enforcement conducted three interviews with MV1: two preliminary interviews conducted by law enforcement personnel and a third interview conducted by a child and adolescent forensic interviewer. MV1 provided the following information during these interviews:

- a. In late fall or early winter of 2020, while MV1 was 13-years-old, MV1 met Haidar on Snapchat and began communicating with him. One day MV1 and Haidar decided to meet up in Haidar's car down the street from MV1's house. During this first meeting, Haidar locked MV1 in his car, handcuffed MV1 to the inside of the door, and raped MV1.
- b. After the rape, MV1 walked home but was locked out of their house—so MV1 called Haidar for help. Haidar picked up MV1 and took them back to Haidar's house; MV1 stayed with Haidar in his house for approximately one week. While MV1 was at Haidar's house, they had sex multiple times which Haidar recorded with his cell phone.

7. The child and adolescent forensic interviewer asked MV1 about Haidar. MV1 spelled Haidar's legal name and said that Haidar went by the nickname "Panda" on Snapchat. Agents confirmed that Haidar goes by "Panda" on Snapchat (the Snapchat account is tied to Haidar's cellular telephone number and the display name for this account is "Panda"). Further, Haidar is pictured with three stuffed pandas in the background of his Facebook profile picture. *See* exhibit A.

8. MV1 also identified the phone number that they had for Haidar as xxx-xxx-0846, and law enforcement has verified that this phone number belongs to Haidar: Haidar identified the number (xxx-xxx-0846) as his cell phone number in

communications with the State of Michigan, and open-source database checks associate the number (xxx-xxx-0846) with Haidar as recently as October 2021.

9. MV1 also described Haidar's house—where MV1 had sex with Haidar—to the child and adolescent forensic interviewer. The interviewer showed MV1 a picture of the residence located at 6xxx [removed] Street in Detroit. MV1 identified that house as Haidar's house and the house in which Haidar had sex with MV1. Michigan Secretary of State records confirm that Haidar lived at the house in Detroit at the time MV1 alleges Haidar had sex with them.

10. MV1 provided investigators with their cellular phone after the first interview. Law enforcement reviewed MV1's phone and found a homemade video of an unknown male having sex with a young person matching the appearance of MV1 (the video was taken from the male perspective; no faces were visible in the video). During MV1's interview with the child and adolescent forensic interviewer, MV1 was shown a screenshot of this video. MV1 confirmed that the video showed Haidar having sex with MV1, in Haidar's house (where MV1 went after being locked out of their own house), and that Haidar was the one filming. MV1 stated that Haidar sent MV1 the pornographic video via Snapchat.

11. In the screenshot shown to MV1, a red bed covering on the bed was the only part of the room visible. After seeing this screenshot, MV1 then confirmed that Haidar had sex with them on a bed with a red bed cover and provided a

detailed description of Haidar's room, including a description of the color (black) and specific layout of the furniture in Haidar's room. Law enforcement then found a Facebook profile picture of Haidar sitting on a bed with a red bed cover, three stuffed pandas in the background, and black furniture matching the layout provided by MV1. *See* exhibit A. Further, I have seen Haidar during surveillance and viewed a copy of his driver's license: the person in exhibit A is who I know to be Ahmad Haidar-Ahmad ("Haidar").

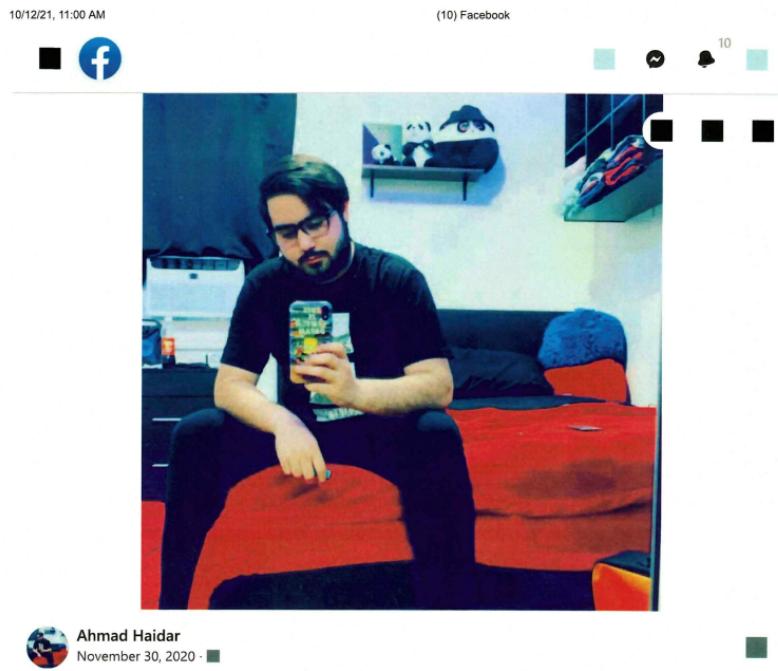


Exhibit A: A picture of Haidar taken from his Facebook account

12. As stated above, MV1 identified Haidar by spelling his full name and by identifying his Snapchat profile name, "Panda". Further, MV1 identified Haidar as the person having sex with MV1 in a video on MV1's phone—a video that MV1 stated that Haidar sent them. MV1 identified Haidar's residence at the time Haidar

had sex with MV1 and described Haidar's bedroom: law enforcement confirmed the address, and MV1's description of Haidar's bedroom matched Haidar's Facebook profile picture.

13. On October 21, 2021, a search warrant, issued in the Eastern District of Michigan, was executed at Haidar's residence. Law enforcement seized the following items, among others:

- a. A cellular device which contained multiple videos of what appears to be Haidar and MV1 engaged in sexual activity, including the video taken from MV1's phone, discussed above. These videos meet the federal definition of child pornography.
- b. A red pillowcase matching the color and design of the bed coverings shown in the video showing Haidar and MV1 engaged in sexual intercourse.
- c. Multiple stuffed animal pandas as described by MV1.

14. Agents also found and took photographs of the black furniture described by MV1 and shown in exhibit A.

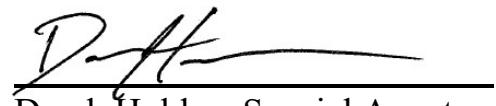
15. During the October 21, 2021 search, agents interviewed Haidar, who admitted communicating with MV1 and knowing that they were under the age of 18 (Haidar claimed that he thought MV1 was 17). Haidar also admitted to having sex with MV1 on multiple occasions, to include at least once in his vehicle (at the time, a BMW – which he has since sold), as well as his prior residence (the residence identified by MV1). Haidar also admitted to filming MV1 and himself

having sex multiple times, storing the videos on his phone, and sending the video to at least two people, one of whom was MV1.

CONCLUSION

16. Based on the facts above, there is probable cause to believe that Ahmad Haidar-Ahmad has possessed child pornography (in violation of 18 U.S.C. § 2252A(a)(5)(B)), distributed child pornography (in violation of 18 U.S.C. § 2252A(a)(2)), and produced child pornography (in violation of 18 U.S.C. § 2251).

Respectfully submitted,



Derek Holden, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Honorable Kimberly G. Altman

United States Magistrate Judge

Date: October 21, 2021